



JEFFREY M. NELSON
Chief Legal Officer

Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

April 7, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: DOCKET NO. 1997-239-C - Proceeding to Establish Guidelines for an Intrastate Universal Service Fund (USF) (Pursuant C.F.R t754.420 FCC) and Lifeline Biennial Audit Reports (See Also 2009-326-C);
DOCKET NO. 2020-106-A — Actions in Response to COVID-19

Dear Ms. Boyd:

The Office of Regulatory Staff (“ORS”) has reviewed both Commission Order No. 2020-210 as well as the letter to the Commission by Mr. Jack Pringle on behalf of Assurance Wireless of SC, LLC (“Assurance”) filed with the Commission on April 2, 2020 (“Assurance Supplement”) in the above referenced dockets.

This matter concerns Lifeline customers’ continued eligibility for Lifeline Service in accordance with the “means test”. Previously when the Federal Communications Commission (“FCC”) has modified federal Lifeline requirements, this Commission has adopted those federal changes. ORS recommends that the same should be done in the present case.

ORS therefore joins Assurance in asking that the Commission amend Order 2020-210. We also recommend that the Commission’s order concerning the adoption of the waivers of federal rules ordered by the FCC simply state that they are for the same period as the FCC waivers are in effect. If the FCC subsequently extends or modifies this period of time, the Commission’s order would not need to be modified.

Letter – Jocelyn G. Boyd, Esquire
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Please contact me and the other parties to this docket should you have any questions regarding this filing or the ORS position in this matter.

Sincerely,

s/ Jeff Nelson

Jeffrey M. Nelson

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)